

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**DECLARATION OF
JONATHAN WOODARD**

I, Jonathan Woodard, declare as follows:

1. I am counsel at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts, 02109. I am one of the attorneys responsible for the representation of Defendant Ford Motor Company in the above-captioned matter.
2. Attached to this declaration as **Exhibit A** is a true and correct copy of Julie Davis's *curriculum vitae*, which was submitted with her November 21, 2014 rebuttal expert report.
3. Attached to this declaration as **Exhibit B** is a true and correct copy of an excerpt from the November 21, 2014 expert report of Dr. Phillip Koopman Regarding Non-Infringement of the Asserted Claims of U.S. Patent Nos. 7,146,260; 7,778,739; 7,793,136; 8,006,117; 8,006,118; 8,006,119; 8,020,028; and 8,027,268.
4. Attached to this declaration as **Exhibit C** is a true and correct copy of an August 6, 2012 letter from Ragnar Olsen of Global IP Law Group to Jennifer Stec of Ford Global

1 Technologies, Inc. bearing the bates number FORD-EHH01132220.

2 5. Attached to this declaration as ***Exhibit D*** are a true and correct copies of excerpts from
3 the transcript of the December 5, 2014 deposition of Michael Wagner.

4 6. Attached to this declaration as ***Exhibit E*** are true and correct copies of excerpts from the
5 transcript of the February 27, 2014 deposition of Samuel Hemingway.

6 7. Attached to this declaration as ***Exhibit F*** is a true and correct copy of a March 1, 2010
7 Asset Purchase Agreement between Eagle Harbor Holdings, LLC and Medius, Inc., bearing
8 Bates numbers EHH0315570-80.

9 8. Attached to this declaration as ***Exhibit G*** is a true and correct copy of a March 16, 2011
10 email from Samuel Hemingway attaching a February 2011 Balance Sheet, bearing Bates
11 numbers EHH0285169-72.

12 I declare under penalty of perjury under the laws of the United States of America that
13 the foregoing is true and correct.

14 Executed this 17th day of February, 2015.

15 /s/ Jonathan Woodard
16 Jonathan Woodard

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served by email upon all counsel of record, this 17th day of February, 2015.

/s/ Duncan E. Manville

Duncan E. Manville